

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

AMAZON.COM, INC., a Delaware corporation;
AMAZON.COM SERVICES LLC, a Delaware
limited liability company; and KONINKLIJKE
PHILIPS N.V., a Netherlands public limited
liability company,

Plaintiffs,

v.

HUMBERTO GONZALEZ, an individual;
CAROLINA MANTILLA HENAO, an individual;
JOSE DAVID GONZALEZ, an individual;
RICHARDO ROJAS, an individual; JONLER
MOFFA, an individual; JUAN JOSE MEZA, an
individual; LUZ MARINA HENAO, an individual;
WORLD WIDE PRODUCTS, INC., a Florida
Corporation; CORABLADE INC., a Florida
corporation; CAFÉ RECORS PRODUCTIONS,
INC., a Florida corporation; EASY SELLER INC.,
a Florida corporation; ECOMMERCE
DISTRIBUTOR, INC., a Florida corporation;
ION INTERNATIONAL PRODUCTS INC. a
Florida corporation; VERENZA IMPORTS, INC., a
Florida corporation; AAA SAFEWAY
TRANSPORTATION, INC., a Florida Corporation;
and DOES 1-10,

Defendants.

NO. 2:22-cv-01671-RSL

**SECOND STIPULATED
MOTION AND PROPOSED
ORDER TO EXTEND TIME TO
RESPOND TO COMPLAINT**

STIPULATED MOTION

COME NOW, the parties, by and through their counsel of record, and submit the following
second stipulated motion and proposed order to extend the time for defendants to answer or

1 otherwise respond to the Complaint until and including March 7, 2024. This Court previously
2 signed on December 15, 2023 the parties' stipulated motion to extend the deadline for answering
3 until February 9, 2024. (ECF Dkt. 16). The parties continue to work cooperatively together and
4 this further request for extension is sought in good faith and not for purposes of delay. The
5 grounds for this motion are as follows:
6

7 1. Since the Court's prior Order the defendants and their counsel have become more
8 fully aware of the impacts a parallel criminal investigation being conducted by the United States
9 Department of Homeland Security could have on their actions in this civil matter.

10 2. Defendants have alerted plaintiffs to the issues and the parties are engaged in
11 discussions about the potential impact of this criminal investigation on this proceeding as well as
12 the implication that discovery may have on the individual defendants' Fifth Amendment rights
13 given their key roles in the operations of the Corporate Defendants.
14

15 3. Contemporaneous with this filing the parties agree that counsel for defendants
16 will initiate a call to Teri Roberts, judicial assistant, to request a 30-day extension of each of the
17 three upcoming deadlines set forth in this Court's Order Regarding Initial Disclosures, Joint
18 Status Report, and Early Settlement. (ECF Dkt. 17).

19 For the reasons set forth above the defendants respectfully request that they be granted an
20 extension until and including March 7, 2024 to answer or otherwise respond to the Complaint.
21 Plaintiffs agree to this request and have again courteously joined in this motion.
22

23 ///

24 ///

25 ///

26

IT IS SO STIPULATED this 1st day of February, 2024.

CHRISTIE LAW GROUP, PLLC

DAVIS WRIGHT TREMAINE

By /s/ Robert L. Christie
ROBERT L. CHRISTIE, WSBA #10895
Attorney for Defendants
2100 Westlake Ave. N., Ste. 206
Seattle, WA 98109
Phone: 206-957-9669
Email: bob@christielawgroup.com

By /s/ Scott R. Commerson
SCOTT R. COMMERSON
Attorney for Plaintiffs
865 S. Figueroa St., Ste. 2400
Los Angeles, CA 90017
Phone: 213-633-6800
Email: scottcommerson@dwt.com

DAVIS WRIGHT TREMAINE


By /s/ Lauren Burdette Rainwater
LAUREN BURDETTE RAINWATER
WSBA # 43625
Attorney for Plaintiffs
920 Fifth Ave., Ste. 3300
Seattle, WA 98104
Phone: 206-622-3150
Email: laurenrainwater@dwt.com

ORDER

Based upon the foregoing Stipulation,

IT IS HEREBY ORDERED, ADJUDGED AND DECREED that the deadline for Defendants to Answer or otherwise respond to the Complaint is extended until and including March 7, 2024.

Dated this 2nd day of February, 2024.



Robert S. Lasnik
United States District Judge